UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

March 6, 2019

Ryan Schaffer
Dunkin' Brands Group, Inc.
ryan.schaffer@dunkinbrands.com

Re: Dunkin' Brands Group, Inc.
Incoming letter dated January 11, 2019

Dear Mr. Schaffer:

This letter is in response to your correspondence dated January 11, 2019 concerning the shareholder proposal (the "Proposal") submitted to Dunkin' Brands Group, Inc. (the "Company") by Dale Wannen (the "Proponent") for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders. Copies of all of the correspondence on which this response is based will be made available on our website at http://www.sec.gov/divisions/corpfin/cf-noaction/14a-8.shtml. For your reference, a brief discussion of the Division's informal procedures regarding shareholder proposals is also available at the same website address.

Sincerely,

M. Hughes Bates
Special Counsel

Enclosure

cc: Dale Wannen
Sustainvest Asset Management, LLC
dale@sustainvest.com

March 6, 2019

Response of the Office of Chief Counsel
Division of Corporation Finance

Re: Dunkin' Brands Group, Inc.
Incoming letter dated January 11, 2019

The Proposal requests that the board issue a report assessing the feasibility of integrating sustainability metrics into the performance quotas of senior executives of the Company's compensation plans.

There appears to be some basis for your view that the Company may exclude the Proposal under rule 14a-8(i)(10). Based on the information you have presented, it appears that the Company's policies, practices and procedures compare favorably with the guidelines of the Proposal and that the Company has, therefore, substantially implemented the Proposal. Accordingly, we will not recommend enforcement action to the Commission if the Company omits the Proposal from its proxy materials in reliance on rule 14a-8(i)(10). In reaching this position, we have not found it necessary to address the alternative basis for omission upon which the Company relies.

Sincerely,

Lisa Krestynick
Attorney-Adviser

DIVISION OF CORPORATION FINANCE
INFORMAL PROCEDURES REGARDING SHAREHOLDER PROPOSALS

The Division of Corporation Finance believes that its responsibility with respect to matters arising under Rule 14a-8 [17 CFR 240.14a-8], as with other matters under the proxy rules, is to aid those who must comply with the rule by offering informal advice and suggestions and to determine, initially, whether or not it may be appropriate in a particular matter to recommend enforcement action to the Commission. In connection with a shareholder proposal under Rule 14a-8, the Division's staff considers the information furnished to it by the company in support of its intention to exclude the proposal from the company's proxy materials, as well as any information furnished by the proponent or the proponent's representative.

Although Rule 14a-8(k) does not require any communications from shareholders to the Commission's staff, the staff will always consider information concerning alleged violations of the statutes and rules administered by the Commission, including arguments as to whether or not activities proposed to be taken would violate the statute or rule involved. The receipt by the staff of such information, however, should not be construed as changing the staff's informal procedures and proxy review into a formal or adversarial procedure.

It is important to note that the staff's no-action responses to Rule 14a-8(j) submissions reflect only informal views. The determinations reached in these no-action letters do not and cannot adjudicate the merits of a company's position with respect to the proposal. Only a court such as a U.S. District Court can decide whether a company is obligated to include shareholder proposals in its proxy materials. Accordingly, a discretionary determination not to recommend or take Commission enforcement action does not preclude a proponent, or any shareholder of a company, from pursuing any rights he or she may have against the company in court, should the company's management omit the proposal from the company's proxy materials.

January 11, 2019

via e-mail to shareholderproposals@sec.gov

Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Dunkin' Brands Group, Inc.
Shareholder Proposal by Mr. Dale Wannen of Sustainvest Asset Management LLC

Ladies and Gentlemen:

Dunkin' Brands Group, Inc., a Delaware corporation (the "Company"), pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), submits this letter to inform the Staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") of the Company's intention to omit from its proxy statement and form of proxy (collectively, the "2019 Proxy Materials") the shareholder proposal (the "Proposal") and the statement in support thereof submitted by Mr. Dale Wannen, President of Sustainvest Asset Management LLC (the "Proponent"). A copy of the Proposal and the statement in support thereof is attached to this letter as Exhibit A. The Company respectfully requests that the Staff concur with the Company's view that the Proposal may properly be excluded from the Company's 2019 Proxy Materials pursuant to Rule 14a-8.

Pursuant to Staff Legal Bulletin No. 14D (November 7, 2008) ("SLB 14D"), we are submitting this request for no-action relief under Rule 14a-8 through the Commission's email address, shareholderproposals@sec.gov (in lieu of providing six additional copies of this letter pursuant to Rule 14a-8(j)), and the undersigned has included his name and telephone number both in this letter and the cover email accompanying this letter. We are simultaneously forwarding a copy of this letter to the Proponent as notice of the Company's intent to omit the Proposal from the 2019 Proxy Materials.

Rule 14a-8(k) under the Exchange Act and SLB 14D provide that shareholder proponents are required to send the Company a copy of any correspondence that the proponents elect to submit to the Commission or Staff. Accordingly, we are taking this opportunity to inform the Proponent that if the Proponent elects to submit additional correspondence to the Commission or Staff with respect to the Proposal, a copy of that correspondence should concurrently be furnished to the undersigned on behalf of the Company pursuant to Rule 14a-8(k) and SLB 14D.

dunkin' brands.

THE PROPOSAL

The Proposal requests that the Company's shareholders approve the following resolution:

> RESOLVED: Shareowners of Dunkin' Brands request the Board to issue a report at reasonable cost, omitting confidential information, by October 1, 2019 assessing the feasibility of integrating sustainability metrics into the performance quotas of senior executives of Dunkin Brands Group Inc. compensation plans.
>
> Supporting Statement: Proponents believe the report could reduce risks associated with employee turnover, accountability and general ESG or corporate sustainability negligence. Certain metrics that could be quantified into this report could include workplace and executive level diversity, greenhouse gas reduction goals, and the utilization of recycled and/or compostable supply chain inputs.

A complete copy of the Proposal and supporting statement is attached to this letter as Exhibit A.

BASIS FOR EXCLUSION

The Company believes that the Proposal may properly be excluded from the 2019 Proxy Materials pursuant to either of the following paragraphs of Rule 14a-8:

- 14a-8(i)(10), as the Proposal has been substantially implemented; or
- 14a-8(i)(7), as the Proposal relates to the Company's ordinary business operations.

ANALYSIS

I. The Proposal may be properly excluded from the Company's 2019 Proxy Materials pursuant to Rule 14a-8(i)(10) because the Company has already substantially implemented the Proposal.

Rule 14a-8(i)(10) permits a company to exclude a shareholder proposal from its proxy materials if the company "has already substantially implemented the proposal." The Staff has agreed that a "determination that the company has substantially implemented the proposal depends upon whether [the company's] particular policies, practices and procedures compare favorably with the guidelines of the proposal." *Texaco, Inc.* (March 28, 1991). The Staff has permitted the exclusion of shareholder proposals under the 'compares favorably' standard when a company's actions have satisfactorily addressed the proposal's underlying concerns and its essential objective, even when the manner by which a company implements the proposal does not correspond precisely to the actions sought by the proponent. *See Wal-Mart Stores, Inc.* (March 25, 2015) (permitting exclusion of a shareholder proposal requesting an employee engagement metric for executive compensation where a "diversity and inclusion metric related to employee engagement" was already included in the company's Management Incentive Plan); *Entergy Corp.* (February 14, 2014) (permitting exclusion of a shareholder proposal requesting a report on potential ways to reduce its greenhouse gas emissions where the requested information was already available in its sustainability and carbon disclosure reports); *Johnson & Johnson* (Feb. 17, 2006) (proposal that requested the company to confirm the legitimacy of all current and future U.S. employees was substantially implemented because the company had verified the legitimacy of 91% of its domestic workforce).

As described below and as relayed to the Proponent during the course of discussions following the receipt of the Proposal, the Company already integrates sustainability metrics into the compensation plans of certain senior executives and other employees. Accordingly, the Company believes that its existing efforts in this area and the related disclosure thereof contained in the compensation discussion and analysis ("CD&A") portion of its proxy statement (and to be contained in its 2019 proxy statement) and its Corporate Social Responsibility ("CSR") report compare favorably with the guidelines of the proposal, having addressed both the proposal's underlying concerns and its essential objective. Rule

14a-8(i)(10) was "designed to avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management." *Exchange Act Release No. 34-12598* (July 7, 1976). Publishing an additional report regarding the feasibility of addressing something the Company already does would be a redundant effort regarding a practice that the Company has already implemented. Accordingly the Company respectfully requests that the Staff permit exclusion of the proposal under Rule 14a-8(i)(10).

A. The Company has already addressed the Proponent's underlying concerns and essential objective

Based upon the Proponent's supporting statement and the language of the Proposal, the Company interprets the Proponent's "underlying concern" to be "risks associated with employee turnover, accountability and general ESG or corporate sustainability negligence." *Supporting Statement*. The Proposal's "essential objective" is to have the Company address these risks by providing information to shareholders regarding the feasibility of incorporating performance goals related to these types of matters into the Company's executive compensation plans. The Company has addressed both the underlying concern and essential objective of the Proposal by already integrating sustainability goals and metrics into its executive compensation program and by providing disclosure regarding these matters in its annual proxy statement, as well as its biannual CSR report, available at https://www.dunkinbrands.com/community/corporate-social-responsibility/reports.

1. The Company already integrates sustainability metrics into its compensation program.

The Proposal requests that the Company's board of directors (the "Board") issue a report "assessing the feasibility of integrating sustainability metrics into the performance quotas of senior executives of Dunkin' Brands Group Inc. compensation plans." This would be a step backwards in the Company's efforts at incorporating sustainability metrics into its community, culture and business, as sustainability metrics are already a component of its executive compensation program. The Company's annual management incentive plan (the "Annual Plan") incorporates three types of goals: Primary, Secondary and Personal. Personal goals for the Annual Plan are measurable operational or business goals that relate directly to the duties and responsibilities of the executive and are weighted at 25% of the Annual Plan payout at target. *See the Company's proxy statement related to its 2018 annual meeting (the "2018 Proxy")* at 35. As disclosed in the 2018 Proxy, the Company included "[a]chieving corporate and brand sustainability goals including finalizing foam cup replacement for Dunkin' Donuts" as a Personal goal in 2017 for two senior executives (its Chairman and Chief Executive Officer and its President, Dunkin' Donuts U.S. and Canada). *2018 Proxy* at 36. In addition, the Company included "[d]eveloping the next generation of leaders at Dunkin's Brands and continuing to make Dunkin's Brands a great place to work for all employees" as a Personal goal for all of its named executive officers in 2017. *2018 Proxy* at 36. Further, as the Company relayed to the Proponent in the course of discussions following receipt of the Proposal, when the Company's proxy statement related to its 2019 annual meeting is filed with the Commission later this year it will disclose that in 2018 each of its named executive officers had a Personal goal of actively supporting diversity and inclusion throughout the Company, including new hires within his or her department and, in addition, the Company's Chief Human Resources Officer (who is a named executive officer) had a Personal goal of increasing diversity in new hires by 10% year-over-year. These 2018 Personal goals were established in January 2018, long before receipt by the Company of the Proposal, and the achievement against these sustainability goals had a direct impact on the compensation earned by the Company's named executive officers in 2018.

While the Board has not previously issued a report as to the feasibility of including sustainability metrics in its executive compensation program, as called for by the Proposal, the fact that the Company has already implemented and disclosed (and will disclose in the case of the 2018 Personal goals

referenced above) to shareholders the Personal goals described above in the Annual Plan indicates that such an effort is clearly feasible. Accordingly, the Company believes that it has already substantially implemented the Proposal and its actions compare favorably with the guidelines of the Proposal. Publishing an additional report as to the feasibility of this action would be wasteful and redundant.

2. *The information contemplated by the Proponent's Supporting Statement is already provided to shareholders in the Company's CD&A disclosure and its biannual CSR report.*

The Company believes that its shareholders are already well-informed about the role of sustainability metrics in its executive compensation program through annual disclosure in its CD&A as well as about the Company's overall efforts at promoting sustainability described in its biannual CSR report. This information addresses the Proposal's essential objective of providing shareholders with information regarding the manner in which sustainability metrics are integrated into the performance quotas of its senior executives under its compensation plans and the Company's efforts to address sustainability.

1. ***CD&A.***

As described in the CD&A included in the 2018 Proxy, "each year, the Compensation Committee reviews and establishes the performance metrics that will be used under the Annual Plan to help ensure that the program design appropriately motivates our executive officers to achieve important financial and operational goals." *2018 Proxy* at 33. Since at least 2017, the Compensation Committee has included sustainability goals as part of the Personal goals for certain executives. In addition, the Company includes within the "Highlights of 2017 Business Performance" a section titled "Continued Commitment to Sustainability" that states that "Dunkin' Brands believes being a good corporate citizen is good business. We set corporate social responsibility (CSR) goals to make continuous progress in the areas of sustainable sourcing, packaging, energy efficiency, waste reduction, nutrition, Diversity & Inclusion and other issues and made important progress toward those goals in 2017." *2018 Proxy* at 29. In addition, the section includes a number of sub-bullets identifying specific sustainability achievements for the year, which include precisely the types of matters identified in the Proponent's Supporting Statement, including: the goal of removing artificial dyes from menu items by the end of 2018, sourcing only Rainforest Alliance Certified™ beans for espresso beverages in the U.S. and a number of international markets by the end of 2018, the continued focus on efforts to advance sustainable palm oil sourcing, progressing against the Company's stated goal of reducing energy use at its corporate facilities as well as its restaurants, and the elimination of all polystyrene foam cups with a targeted completion date of mid-2020. *2018 Proxy* at 29. Because the Company establishes Personal goals that "relate directly to the duties and responsibilities of the individual executive[,]" not every executive has a sustainability metric as a part of his or her Personal goals. However, the incorporation of sustainability metrics as Personal goals for those employees who are best positioned to make meaningful progress against the Company's CSR goals demonstrates that sustainability metrics are already being considered by the Compensation Committee and, in fact, are feasible and are being integrated into the performance quotas of senior executives. Consistent with prior practice of the Company and the Compensation Committee, the Compensation Committee anticipates disclosing information about achievement of 2018 Personal goals for the Annual Plan as well as its 2018 business performance highlights related to sustainability in the Company's proxy statement for the 2019 annual shareholders' meeting.

In accordance with Rule 14a-20 under the Exchange Act, the shareholders of the Company have had the opportunity to provide the Company with an advisory vote on executive compensation since 2012. The Company's compensation program has never failed a 'say-on-pay' vote, and in 2018, 98.5% of shareholders approved the Company's compensation program, including the description of the 2017 performance goals, which included the Personal goals related to sustainability described above.

*2. **CSR Report***

The Company publishes its CSR report biannually. The Company devotes significant time and attention to selecting the topics highlighted by the CSR report and follows the Global Reporting Initiative's Principals for Defining Report Content as a basis for judging which issues are material enough to be included in the report. There are four significant steps in this process, including identification of material topics, prioritizing the issues, validating the material issues and aspects internally and reviewing them with stakeholders, including guests and shareholders. This process resulted in the identification of 29 material issues organized into 9 groups in the 2015-2016 CSR report, which was published in 2017. The Company has and continues to engage an independent consultant to help it identify and prioritize the material issues included in the report. The result of these efforts is a carefully prioritized document that provides shareholders with detailed information about the Company's CSR priorities, including sustainability priorities, and how it has performed against the priorities disclosed in prior CSR reports. The CSR priorities identified in the CSR report inform the Company's CSR-related goals that are incorporated into the Personal goals under the Annual Plan for those employees who are best positioned to make meaningful progress against those priorities.

While the Proponent references in its Proposal the fact that "the latest corporate sustainability report (CSR) made available by Dunkin' to shareholders to supply data on corporate sustainable responsibility is dated 2015-2016[,]" the Proponent fails to acknowledge that the disclosures that accompany that CSR report on the Company's website make clear that the Company publishes its CSR report biannually and, as a result, ignores the fact that the Company will publish its next CSR report this year, covering the years 2017 and 2018. Publishing an additional report regarding the feasibility of addressing something the Company already does would be a redundant effort regarding a practice that the Company has already implemented. For all of the foregoing reasons described in this Section I, the Company respectfully requests that the Staff permit exclusion of the proposal under Rule 14a-8(i)(10).

II. The Proposal may also be excluded from the Company's 2019 Proxy Materials pursuant to Rule 14a-8(i)(7) because it deals with matters relating to the Company's ordinary business operations.

Rule 14a-8(i)(7) provides that a shareholder proposal may be omitted from a proxy statement "[i]f the proposal deals with a matter relating to the company's ordinary business operations." As recently reiterated by the Staff, the purpose of the exception is "to confine the resolution of ordinary business problems to management and the board of directors." *Staff Legal Bulletin 14J* ("SLB 14J"). The Staff's 1998 Release described two "central considerations" for the exclusion of a proposal under the ordinary business exception. The first relates to matters "so fundamental to management's ability to run a company on a day-to-day basis" that they could not be subject to direct shareholder oversight. The second "relates to the degree to which the proposal seeks to 'micro-manage' the company." *Exchange Act Release No. 40018* (May 21, 1998). In Staff Legal Bulletin 14I, the Staff stated that "[u]nder the first consideration, proposals that raise matters that are 'so fundamental to management's ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight' may be excluded, unless such a proposal focuses on policy issues that are sufficiently significant because they transcend ordinary business and would be appropriate for a shareholder vote." While the Staff confirmed in SLB 14J, that proposals that focus on significant aspects of senior executive and/or director compensation generally are not excludable under Rule 14a-8(i)(7), the Staff also noted that it will concur in the exclusion of a proposal that "while styled as senior executive and/or director compensation proposals, have…as their underlying concern ordinary business matters." In addition, the Staff further clarified in SLB 14J that for "[p]roposals where the focus is on aspects of compensation that are available or apply to senior executive officers, directors, and the general workforce…[c]ompanies may generally rely on Rule 14a-8(i)(7) to omit the proposal from their proxy materials." The Staff has also stated that a proposal requesting the publication of a report may be excluded under Rule 14a-8(i)(7)

if the subject matter of the report involves a matter of ordinary business. *See Exchange Act Release No. 20091* (Aug. 16, 1983).

A. The Proposal, while styled as a senior executive compensation proposal, has as its underlying concern ordinary business matters.

In SLB 14J, the Staff stated that "[i]n evaluating proposals that raise both ordinary business and senior executive and/or director compensation matters, the staff examines whether the focus of the proposal is an ordinary business matter or aspects of senior executive and/or director compensation. Where the focus appears to be on the ordinary business matter, the proposal may be excludable under Rule 14a-8(i)(7)." In the instant case, the underlying subject matter of the Proposal appears to be sustainability metrics and goals. While the Proposal requests a report "assessing the feasibility of integrating sustainability metrics into the performance quotas of senior executives of Dunkin Brands Group Inc. compensation plans", such reference to a feasibility report belies the apparent focus of the Proposal, as indicated in the Proponent's Supporting Statement, that "[c]ertain metrics that could be quantified into this report could include workplace and executive level diversity, greenhouse gas reduction goals, and the utilization of recycled and/or compostable supply chain inputs." It appears that the focus of the Proposal is not on the feasibility of integrating sustainability metrics into performance quotas under the Company's compensation plans—something that is obviously feasible given that the Company already does it—but instead obtaining a report that includes sustainability metrics and goals (which, as noted above, the Company already produces biannually in the form of a detailed CSR report). Given the Company's existing CSR report and its publicly announced timeline for producing additional CSR reports, the Company does not believe that the ordinary business matters underlying the Proposal focus on any additional policy issues that are sufficiently significant because they transcend ordinary business such that they would be appropriate for a shareholder vote. As a result, the Company believes that the Proposal is properly excludable under Rule 14a-8(i)(7).

B. The Proposal focuses on aspects of compensation policy that apply to senior executive officers as well as the Company's general workforce.

In SLB 14J, the Staff stated that "the availability of certain forms of compensation to senior executives and/or directors that are also broadly available or applicable to the general workforce does not generally raise significant compensation issues that transcend ordinary business matters. In this regard, it is difficult to conclude that a proposal does not relate to a company's ordinary business when it addresses aspects of compensation that are broadly available or applicable to a company's general workforce, even when the proposal is framed in terms of the senior executives and/or directors." In addition, SLB 14J states that ""[t]he Division believes that a proposal that addresses senior executive and/or director compensation may be excludable under Rule 14a-8(i)(7) if a primary aspect of the targeted compensation is broadly available or applicable to a company's general workforce and the company demonstrates that the executives' or directors' eligibility to receive the compensation does not implicate significant compensation matters."

In this case, in addition to already including sustainability metrics in the performance metrics for its named executive officers (as described above), the Company also uses sustainability metrics in the Personal goals under the Annual Plan for its employees generally where the particular employee is best positioned as a result of his or her job function to make meaningful progress against the Company's sustainability goals. For example, the Company's Vice President, Government Affairs & Sustainability, Sr. Director of Global Design and Construction Services and its Sustainability Specialist, among others (none of whom is an executive officer of the Company), all have Personal goals that include sustainability metrics as part of their incentive compensation arrangements. Further, the Company does not believe that the Proposal addresses a significant compensation matter as its only asks for a report on the feasibility of integrating sustainability metrics into performance quotas under compensation plans—something that is

obviously feasible given the Company's current inclusion of sustainability metrics in Personal goals for certain employees under the Annual Plan. Because the focus of the Proposal is on aspects of compensation that not only apply to the Company's senior executives, but also its general workforce and does not implicate a significant compensation matter, the Company believes that, consistent with the Staff's views expressed in SLB 14J, the Proposal relates to the Company's ordinary business and is properly excludable under Rule 14a-8(i)(7), notwithstanding that the Proposal is framed in terms of the Company's senior executives.

In light of the reasons described above, the Company respectfully requests that the Staff permit exclusion of the proposal under Rule 14a-8(i)(7).

CONCLUSION

Based upon the foregoing analysis, we respectfully request that the Staff concur that it will take no action if the Company excludes the Proposal from its 2019 Proxy Materials.

In the event the Staff disagrees with any conclusion expressed herein, or should any information in support or explanation of the Company's position be required, we would appreciate an opportunity to confer with the Staff before issuance of its response. If the Staff has any questions regarding this request or requires additional information, please contact the undersigned at (781) 737-5015. We appreciate your attention to this request.

Very truly yours,

Dunkin' Brands Group, Inc.

Ryan Schaffer
Senior Director & Legal Counsel

cc: Dale Wannen (Sustainvest Asset Management LLC)
Richard J. Emmett (Dunkin' Brands Group, Inc.)
Craig E. Marcus (Ropes & Gray LLP)

Exhibit A

PROPONENT'S PROPOSAL

[See attached]

Report on Compensation to Sustainability Metrics

Dale Wannen, President of Sustainvest Asset Management LLC, is the proponent of the following shareholder resolution.

Whereas, Dunkin Brands Corporate Social Responsibility (CSR) states the company is "committed to showing constant improvement in the area of corporate social responsibility. This involves continuous improvement in four areas that govern CSR strategy: Our Guests, Our Planet, Our People and Our Neighborhoods" yet shareholders have yet to see how executives at our company are being evaluated per these commitments.

Whereas, many multi-national companies including Intel, Alcoa, Pepsi, Mead Johnson and Walt Disney have integrated sustainability metrics into their executive pay incentive plans.

Whereas, a May 2014 report by Ceres, a sustainability advocacy non-profit, found that a growing number of companies are incorporating sustainability performance into executive compensation packages. According to the Ceres' report, 24% of companies now link executive compensation to sustainability performance, up from 15% in 2012.

Whereas, BlackRock, the largest asset manager in the world, recently said, "Environmental, social, and governance (ESG) factors relevant to a company's business can provide essential insights into management effectiveness and thus a company's long-term prospects."

Whereas, publicly traded company Royal DSM, tied 50 percent of short term executives' bonuses to sustainability goals reducing greenhouse gas emissions, using more sustainable products and services in the supply chain and reducing water usage, beginning these initiatives in 2010 for over 400 company executives. CEO of Royal DSM North American stated, "We see that this is a means to create a sustainable competitive advantage."

Whereas, according to a recent article in the Harvard business review, a strong commitment to sustainability can boost a company's reputation with customers and employees, generate political capital with government regulators, create profitable new products and services to address the urgent global needs such as those associated with scarce water supplies, hunger, and greenhouse gas emissions and some sustainability investments can pay for themselves through reduced energy consumption and waste over the long term.

Whereas, Alcoa the third largest aluminum producer in the world, has made 20 percent of executive compensation tied to safety, environmental stewardship, voluntary GHG reductions and energy efficiency, according to a 2015 Ceres report.

Whereas, the latest corporate sustainability report (CSR) made available by Dunkin to shareholders to supply data on corporate sustainable responsibility is dated 2015-2016.

RESOLVED: Shareowners of Dunkin Brands request the Board to issue a report at reasonable cost, omitting confidential information, by October 1, 2019 assessing the feasibility of integrating sustainability metrics into the performance quotas of senior executives of Dunkin Brands Group Inc. compensation plans.

Supporting Statement: Proponents believe the report could reduce risks associated with employee turnover, accountability and general ESG or corporate sustainability negligence. Certain metrics that could be quantified into this report could include workplace and executive level diversity, greenhouse gas reduction goals, and the utilization of recycled and/or compostable supply chain inputs.